

DEPARTMENT OF TRANSPORTATION

U. S. COAST GUARD

STATEMENT OF ADMIRAL J. W. KIME

STCW, MARPOL ANNEX III, AND THE 1988 PROTOCOLS TO SOLAS

AND LOADLINE CONVENTIONS

UNITED STATES SENATE

COMMITTEE ON FOREIGN RELATIONS

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STATEMENT OF  
ADMIRAL J. W. KIME  
BEFORE THE  
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REGARDING THE  
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GOOD MORNING, MR. CHAIRMAN AND DISTINGUISHED MEMBERS OF THE COMMITTEE. IT IS A PLEASURE FOR ME TO APPEAR BEFORE YOU TODAY TO DISCUSS THE COAST GUARD'S VIEWS ON FOUR TREATIES WHICH HAVE BEEN NEGOTIATED AT THE INTERNATIONAL MARITIME ORGANIZATION (IMO), AND FORMALLY TRANSMITTED TO THE SENATE FOR ADVICE AND CONSENT TO RATIFICATION. THESE TREATIES WILL PROMOTE SAFETY OF LIFE AT SEA AND PROTECTION OF THE MARINE ENVIRONMENT.

WITH ME TODAY IS REAR ADMIRAL JOEL D. SIPES, CHIEF OF THE OFFICE OF MARINE SAFETY, SECURITY AND ENVIRONMENTAL PROTECTION.

THE INTERNATIONAL CONVENTION ON STANDARDS OF TRAINING, CERTIFICATION AND WATCHKEEPING FOR SEAFARERS (STCW), 1978, ESTABLISHES MINIMUM STANDARDS FOR TRAINING AND QUALIFYING CREWMEMBERS ON SEAGOING SHIPS. IT WAS ADOPTED BY AN INTERNATIONAL CONFERENCE IN 1978 AND ENTERED INTO FORCE ON APRIL 28, 1984. EIGHTY COUNTRIES ARE NOW STATES PARTIES TO THIS CONVENTION. THERE IS BROAD INDUSTRY AND ENVIRONMENTAL SUPPORT FOR ADVICE AND CONSENT.

THIS CONVENTION WAS DEVELOPED UNDER THE AUSPICES OF THE INTERNATIONAL MARITIME ORGANIZATION, THE U.N. SPECIALIZED AGENCY WHICH DEALS WITH MARITIME MATTERS, AND HAS BECOME THE BASIC INTERNATIONAL FRAMEWORK FOR ADDRESSING ISSUES RELATING TO

PROFESSIONAL QUALIFICATIONS FOR MERCHANT SEAMEN. THE UNITED STATES WAS A MAJOR FORCE AT IMO IN THE ORIGINAL DEVELOPMENT OF THE UNIVERSALLY ACCEPTABLE STANDARDS CONTAINED IN THE CONVENTION AND HAS CONTINUED TO PLAY A LEADERSHIP ROLE AT IMO IN ENSURING THAT THE CONVENTION REMAINS VITAL AND EFFECTIVE AS AN INSTRUMENT OF INTERNATIONAL REGULATION TO PROMOTE AND IMPROVE SAFETY OF LIFE AND PROPERTY AT SEA AND TO PROTECT THE MARINE ENVIRONMENT.

THE UNITED STATES WAS ONE OF THE 72 COUNTRIES WHICH SIGNED THE STCW CONVENTION, SUBJECT TO RATIFICATION, WHEN IT WAS ELABORATED IN 1978. SINCE THAT TIME, THE COAST GUARD HAS WORKED STEADILY TO REVISE DOMESTIC LICENSING REGULATIONS TO ENSURE THEY ARE FULLY CONSISTENT WITH THE CONVENTION. THIS WAS A MAJOR UNDERTAKING WHICH INVOLVED CONSIDERATION OF THE IMPACTS ON ALL SEGMENTS OF OUR MARITIME INDUSTRY. WE HAVE ALSO WORKED TO ENSURE THAT UNITED STATES INTERESTS WILL NOT BE ADVERSELY AFFECTED BY IMPLEMENTATION OF THE CONVENTION. I WISH TO EXPRESS MY APPRECIATION TO THE REPRESENTATIVES OF THE MARINE INDUSTRY FOR THEIR CONSTRUCTIVE AND POSITIVE COOPERATION IN ASSISTING US IN MANAGING THIS COMPLICATED EFFORT.

THERE ARE MANY BENEFITS TO THE UNITED STATES BECOMING A PARTY TO THIS IMPORTANT CONVENTION.

FIRST, IT WILL BE AN ANNOUNCEMENT TO THE WORLD MARITIME COMMUNITY THAT THE U.S. FULLY SUPPORTS THE UNDERLYING PURPOSE AND OBJECTIVE OF THE CONVENTION -- TO IMPROVE SHIP SAFETY AND PREVENT POLLUTION BY IMPROVING THE PROFESSIONAL QUALIFICATIONS OF SEAFARERS -- AND WILL THEREBY ENCOURAGE GREATER RESPECT FOR THE PRINCIPLES ARTICULATED IN THE CONVENTION BY

COUNTRIES WHICH HAVE BEEN SOMEWHAT RELAXED IN THEIR IMPLEMENTATION;

SECOND, FAILURE TO RATIFY THE CONVENTION WILL RESULT IN PARTY STATES CHALLENGING THE ACCEPTABILITY OF OUR MARINERS' LICENSES WHEN THE U.S. VESSELS ARRIVE IN THOSE PORTS. OUR VESSELS MAY BE DETAINED OR DELAYED UNTIL PORT STATE OFFICIALS ARE SATISFIED THAT OUR MARINERS MET SUITABLE STANDARDS TO OBTAIN THEIR LICENSES. RATIFICATION WILL FACILITATE MOVEMENT OF OUR VESSELS AS THE CONVENTION REQUIRES THAT LICENSES ISSUED BY PARTY STATES BE ACCEPTED UNLESS THERE ARE GROUNDS TO BELIEVE THEY ARE FRAUDULENT.

THIRD, IT WILL FACILITATE ENFORCEMENT OF CERTIFICATION STANDARDS IN RESPECT TO CREWMEMBERS ON FOREIGN VESSELS IN U.S. PORTS (THIS IS AN ESPECIALLY IMPORTANT FACTOR AS WE DECIDE ON THE BEST MEANS OF IMPLEMENTING THE OIL POLLUTION ACT OF 1990); AND

FOURTH, IT WILL REINFORCE THE CREDIBILITY OF THE UNITED STATES AS IT PURSUES INITIATIVES TO IMPROVE VESSEL SAFETY AND POLLUTION PREVENTION THROUGH FUTURE AMENDMENTS TO THIS CONVENTION AT THE INTERNATIONAL MARITIME ORGANIZATION AS WELL AS OTHER PROSPECTIVE CONVENTIONS.

NO IMPLEMENTING LEGISLATION OR FUNDING WILL BE REQUIRED FOR THE UNITED STATES TO BECOME A PARTY TO THIS CONVENTION.

THE UNITED STATES WAS A LEADER DURING THE DEVELOPMENTAL STAGE OF THE STCW CONVENTION IN THE 1970'S AND HAS REMAINED A LEADER AT IMO IN ITS INTERNATIONAL IMPLEMENTATION. THE ADMINISTRATION BELIEVES THE TIME IS NOW RIGHT FOR THE UNITED STATES TO RATIFY THE CONVENTION IN THE INTEREST OF IMPROVING INTERNATIONAL

STANDARDS OF TRAINING AND QUALIFICATION FOR MERCHANT SEAMEN. WE STRONGLY RECOMMEND THAT THE SENATE, WITHOUT RESERVATION, GIVE ITS ADVICE AND CONSENT TO RATIFICATION OF THE INTERNATIONAL CONVENTION ON STANDARDS OF TRAINING, CERTIFICATION AND WATCHKEEPING FOR SEAFARERS, 1978. AS COMMANDANT, I WOULD BE VERY PROUD TO GO TO IMO'S SEVENTEENTH ASSEMBLY IN OCTOBER TO ANNOUNCE THAT THE UNITED STATES HAS BECOME A PARTY TO THIS IMPORTANT ACCORD.

THE NEXT ITEM I WISH TO DISCUSS IS ANNEX III TO THE INTERNATIONAL CONVENTION FOR THE PREVENTION OF POLLUTION FROM SHIPS, 1973, AS MODIFIED BY THE PROTOCOL OF 1978, RELATING THERETO (MARPOL 73/78). I WILL BEGIN BY GIVING YOU A BRIEF VIEW OF WHERE ANNEX III FALLS IN THE INTERNATIONAL POLLUTION PREVENTION SCHEME ESTABLISHED BY THE MARPOL TREATY AND WHAT ANNEX III IS INTENDED TO ACCOMPLISH.

AS YOU KNOW, THE MARPOL TREATY HAS FIVE ANNEXES THAT RELATE TO PARTICULAR SOURCES OF MARINE POLLUTION. THE U.S. IS BOUND BY THE CONVENTION AND ANNEXES ONE AND TWO, WHICH DEAL WITH THE TRANSPORT OF OIL AND HARMFUL SUBSTANCES CARRIED IN BULK. OF THE THREE OPTIONAL ANNEXES, WE HAVE RATIFIED ANNEX V, WHICH RELATES TO SHIP-GENERATED GARBAGE AND PLASTICS. ANNEX III IS ONE OF THE REMAINING TWO. IT DEALS WITH THE TRANSPORT OF HARMFUL SUBSTANCES IN PACKAGED FORM. THESE CARGOES ARE THOSE WHICH PRESENT POTENTIAL THREATS TO THE MARINE ENVIRONMENT IF THEY ARE RELEASED. THE "BIG PICTURE" GOAL OF ANNEX III IS TO GIVE THESE ENVIRONMENTALLY HARMFUL SUBSTANCES SAFEGUARDS IN MARINE TRANSPORTATION SIMILAR TO THOSE GIVEN HAZARDOUS MATERIALS.

ANNEX III SETS FORTH GENERAL REGULATIONS FOR THE MARINE TRANSPORTATION OF THESE HARMFUL SUBSTANCES. SOME OF THESE SUBSTANCES, SUCH AS PESTICIDES AND HERBICIDES, IF RELEASED CAN KILL OR RETARD THE GROWTH OF MARINE LIFE OR CAN BIO-ACCUMULATE IN MARINE ORGANISMS, CAUSING POTENTIAL DANGER IN THE FOOD CHAIN, INCLUDING HEALTH RISKS TO HUMANS AND WILDLIFE. ANNEX III'S MAJOR PROVISIONS INCLUDE:

- A REQUIREMENT THAT THE PACKAGING OF HARMFUL SUBSTANCES BE ADEQUATE TO MINIMIZE THE HAZARD TO THE MARINE ENVIRONMENT POSED BY THE PACKAGES' SPECIFIC CONTENTS.

- A REQUIREMENT THAT PACKAGES BE MARKED WITH A DURABLE AND DISTINCTIVE LABEL WHICH IDENTIFIES THE CONTENTS AND INDICATES THAT THE CONTENTS ARE POTENTIALLY HARMFUL.

- A REQUIREMENT THAT PACKAGES BE STOWED ON BOARD SHIP IN A WAY THAT MINIMIZES THE RISK TO THE MARINE ENVIRONMENT.

- A REQUIREMENT THAT THE VESSEL CARRY A SPECIAL LIST OR MANIFEST SETTING FORTH THE HARMFUL SUBSTANCES ON BOARD AND THEIR STOWAGE LOCATIONS.

- PERMISSION FOR PARTIES TO PROHIBIT OR IMPOSE QUANTITY LIMITATIONS ON THE CARRIAGE OF CERTAIN SUBSTANCES.

UNLIKE ANNEXES I AND II OF MARPOL 73/78, WHICH HAVE BEEN CONSTRUED TO APPLY ONLY TO SEAGOING VESSELS, ANNEX III WILL APPLY TO ALL SHIPS THAT CARRY HARMFUL SUBSTANCES IN PACKAGED FORM. AS WITH THE OTHER MARPOL 73/78 ANNEXES, WE WILL BE REQUIRED TO APPLY THE REQUIREMENTS OF ANNEX III TO SHIPS OF NON-PARTY STATES THAT USE OUR PORTS OR OFFSHORE TERMINALS.

UNDER THE PROVISION OF MARPOL 73/78, ANNEX III WILL ENTER INTO FORCE TWELVE MONTHS AFTER THE DATE ON WHICH AT LEAST 15 STATES HAVE BECOME PARTIES, THE COMBINED MERCHANT FLEETS OF WHICH CONSTITUTE AT LEAST 50 PERCENT OF THE GROSS TONNAGE OF THE WORLD'S MERCHANT SHIPPING. SO FAR 40 COUNTRIES CONSTITUTING APPROXIMATELY 48.22 PERCENT OF THE WORLD'S MERCHANT TONNAGE HAVE RATIFIED ANNEX III. UNITED STATES' RATIFICATION WOULD CONTRIBUTE SUFFICIENT TONNAGE TO BRING ANNEX III INTO FORCE. THIS WOULD DO MUCH TO DEMONSTRATE OUR CONTINUED RESOLVE TO PROTECT THE MARINE ENVIRONMENT THROUGH COOPERATION WITHIN THE INTERNATIONAL COMMUNITY.

ANNEX III WILL BE IMPLEMENTED INTERNATIONALLY THROUGH THE INTERNATIONAL MARITIME DANGEROUS GOODS CODE (IMDG). THIS IS A SET OF RECOMMENDED INTERNATIONAL SAFETY STANDARDS FOR THE CARRIAGE OF DANGEROUS GOODS. DOMESTICALLY, THE ANNEX WILL BE IMPLEMENTED THROUGH REGULATIONS ISSUED BY THE DEPARTMENT OF TRANSPORTATION'S RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION.

ANNEX III HAS THE SUPPORT OF THE DEPARTMENT OF STATE AND ALL OTHER INTERESTED DEPARTMENTS AND AGENCIES OF THE EXECUTIVE BRANCH. THE ANNEX CARRIES THE BROAD SUPPORT OF BOTH ENVIRONMENTAL AND INDUSTRY ORGANIZATIONS.

ANNEX III WILL MAKE A SIGNIFICANT CONTRIBUTION TO THE PROTECTION OF THE MARINE ENVIRONMENT BY SUBSTANTIALLY REDUCING THE THREAT OF ACCIDENTAL OR OPERATIONAL RELEASE OF HARMFUL SUBSTANCES. I VIGOROUSLY RECOMMEND ITS QUICK RATIFICATION.

FINALLY, I WOULD LIKE TO ADDRESS THE IMPLEMENTATION OF THE 1988 PROTOCOLS TO THE INTERNATIONAL CONVENTION FOR THE SAFETY OF

LIFE AT SEA (SOLAS), AND THE INTERNATIONAL CONVENTION ON LOAD LINES (ICLL). IMO HAS DEVELOPED THE PROTOCOL OF 1988 RELATING TO ICLL 1966, AND THE PROTOCOL OF 1988 RELATING TO SOLAS 1974. THE CHANGES CONTAINED IN THE PROTOCOLS WILL SERVE TO COORDINATE AND HARMONIZE THE REQUIRED INSPECTION SCHEMES CONTAINED IN THESE CONVENTIONS. THE INSPECTION INTERVALS WILL BE COORDINATED IN ORDER TO MINIMIZE DISRUPTION TO VESSEL SCHEDULES AND MAXIMIZE INSPECTION EFFICIENCY. THE UNITED STATES IS PARTY TO THESE TREATIES, AND WILL BENEFIT FROM THESE CHANGES.

SOLAS 74 APPLIES TO ALL MECHANICALLY PROPELLED PASSENGER VESSELS CARRYING MORE THAN 12 PASSENGERS, AND TO CARGO VESSELS OF 500 GROSS TONS OR GREATER THAT ENGAGE IN INTERNATIONAL VOYAGES. THIS CONVENTION CONTAINS STANDARDS AND PROCEDURES RELATING TO VESSEL SAFETY, WITH EMPHASIS ON LIFESAVING EQUIPMENT, STRUCTURAL FIRE PROTECTION, AND FIRE PROTECTION SYSTEMS ON BOARD THESE VESSELS.

ICLL 66 ESTABLISHES UNIFORM PRINCIPLES GOVERNING THE SAFE LOADING OF SHIPS ON INTERNATIONAL VOYAGES. THE CONVENTION CONTAINS REGULATIONS FOR DETERMINING THE LOCATION OF A VESSEL'S LOAD LINE MARK, WHICH IS INSCRIBED ONTO THE SIDE OF THE VESSEL TO MARK THE POINT BEYOND WHICH A VESSEL MAY NOT BE SAFELY LOADED.

COMPLIANCE WITH SOLAS AND ICLL REQUIRES THAT A VESSEL UNDERGO AN INITIAL SURVEY AND MARKING BY THE GOVERNMENT OF THE COUNTRY WHOSE FLAG THE SHIP IS FLYING, OR ITS REPRESENTATIVE. ONCE THE FLAG ADMINISTRATION OR ITS REPRESENTATIVE IS SATISFIED THAT A VESSEL MEETS THE REQUIREMENTS OF THE APPLICABLE CONVENTION, CERTIFICATES WITH EXPIRATION DATES ARE ISSUED TO THE VESSEL



ATTESTING TO ITS COMPLIANCE WITH THE APPROPRIATE CONVENTION. NO SHIP TO WHICH SOLAS AND ICLL APPLY MAY PROCEED TO SEA UNLESS THE SHIP HAS BEEN SURVEYED AND MARKED, AND APPROPRIATE CERTIFICATES HAVE BEEN ISSUED. MOST VESSELS ARE SUBJECT TO THE REQUIREMENT OF BOTH SOLAS AND ICLL. THE VESSEL SUBSEQUENTLY UNDERGOES PERIODIC SURVEYS TO ENSURE IT REMAINS IN COMPLIANCE WITH CONVENTION STANDARDS, AT WHICH TIME ITS CERTIFICATES ARE EITHER ENDORSED OR REISSUED. THESE CERTIFICATES ARE PRESENTED BY THE VESSEL TO THE APPROPRIATE AUTHORITIES WHEN VISITING A FOREIGN PORT OF A GOVERNMENT THAT IS ALSO A PARTY TO THE CONVENTIONS.

CURRENTLY, SOLAS CERTIFICATES ARE NORMALLY ISSUED FOR A PERIOD OF ONE, TWO, OR FIVE YEARS, DEPENDING ON THE SPECIFIC TYPE OF CERTIFICATE. LOAD LINE CERTIFICATES ARE NORMALLY ISSUED FOR A PERIOD OF FIVE YEARS. THESE VARYING PERIODS OF VALIDITY NECESSITATE DIFFERENT SURVEY INTERVALS TO MAINTAIN OR REISSUE THE CERTIFICATES. THESE SURVEYS, COMBINED WITH THOSE SPECIFIED BY FLAG ADMINISTRATIONS FOR COMPLIANCE WITH DOMESTIC REQUIREMENTS AND THOSE REQUIRED BY CLASSIFICATION SOCIETIES, RESULT IN AN EXCESSIVE NUMBER OF SURVEY VISITS, AND THUS UNWARRANTED DELAYS OF THE SHIP.

THE HARMONIZED SYSTEM OF SURVEYS AND CERTIFICATION EMBODIED IN THE 1988 PROTOCOLS TO SOLAS AND ICLL WILL REDUCE THIS CONFUSION AND BURDEN FOR SHIP OWNERS AND OPERATORS, FLAG ADMINISTRATIONS, AND CLASSIFICATION SOCIETIES, BY ALLOWING THE INITIAL, PERIODICAL, ANNUAL, INTERMEDIATE, AND/OR RENEWAL SURVEYS OF THE TWO CONVENTIONS TO OCCUR AT THE SAME TIME EACH YEAR. IN THIS MANNER, THE ATTENDING SURVEYOR CAN INSPECT A SHIP FOR

COMPLIANCE WITH BOTH CONVENTIONS DURING ONE SURVEY VISIT. THIS WILL ENSURE THAT SURVEYS COVERING THE ENTIRE SHIP AND ITS EQUIPMENT ARE ACCOMPLISHED REGULARLY AND PROVIDE FLAG ADMINISTRATIONS WITH BETTER UTILITY OF THEIR SURVEYORS. IT WILL ALSO ALLOW SHIP OWNERS AND OPERATORS IMPROVED SCHEDULING OF THEIR SHIPS, AND WILL REDUCE THE ECONOMIC BURDEN CAUSED BY DELAYING SHIPS WHILE CONDUCTING INSPECTIONS.

IMPROVEMENT OF THE INTERNATIONAL SYSTEM FOR SURVEY, INSPECTION AND CERTIFICATION HAS BEEN AN IMPORTANT GOAL OF THE UNITED STATES, SINCE THE U.S. INITIATED AMENDMENTS TO SOLAS AND ICLL IN 1978 PROVIDING FOR A HARMONIZED SYSTEM. ENTRY INTO FORCE OF THE 1988 PROTOCOLS WILL MEET THE UNITED STATES OBJECTIVE OF IMPROVING THE INTERNATIONAL SYSTEM FOR SURVEYING AND CERTIFICATING SHIPS TO A LEVEL MORE CONSISTENT WITH U.S. STANDARDS. THE 1988 PROTOCOLS WILL MAINTAIN COMPATIBILITY WITH CURRENT COAST GUARD INSPECTION REQUIREMENTS FOR U.S. SHIPS AND MINIMIZE THE IMPACT ON UNITED STATES SHIP OWNERS AND OPERATORS.

INITIAL, PERIODIC, ANNUAL, INTERMEDIATE, AND RENEWAL SURVEYS REQUIRED UNDER THE 1988 PROTOCOLS MUST BE CONDUCTED ON AN ANNUAL BASIS, WITH A VARIANCE OF PLUS OR MINUS THREE MONTHS. THESE SURVEYS CAN BE CONDUCTED AT THE SAME TIME THE COAST GUARD CONDUCTS INSPECTIONS REQUIRED UNDER DOMESTIC LAW. IN ADDITION, VERIFICATION FOR COMPLIANCE WITH THE REQUIREMENTS OF BOTH CONVENTIONS CAN BE CONDUCTED AT THE SAME TIME, THEREBY REDUCING THE NUMBER OF VISITS AN INSPECTOR MUST MAKE TO EACH SHIP. THE ISSUANCE OF SOLAS AND ICLL CERTIFICATES WITH A STANDARD PERIOD OF VALIDITY OF FIVE YEARS WILL REDUCE THE GOVERNMENT'S PAPERWORK

BURDEN. IT IS ALSO EXPECTED THAT THE ADDED SURVEY REQUIREMENTS IN THE PROTOCOLS WILL IMPROVE THE LEVEL OF SAFETY OF FOREIGN SHIPS ENTERING UNITED STATES PORTS.

IN ADDITION TO PROVIDING FOR A HARMONIZED SYSTEM OF SURVEY AND CERTIFICATION, THE 1988 PROTOCOL TO THE ICLL ALSO INCORPORATES FOUR SETS OF TECHNICAL AMENDMENTS TO THE CONVENTION WHICH WERE ADOPTED IN 1971, 1975, 1979, AND 1983, BUT WHICH NEVER RECEIVED THE NECESSARY EXPLICIT ACCEPTANCE BY THE REQUIRED TWO-THIRDS OF THE CONTRACTING GOVERNMENTS TO ENTER INTO FORCE. CONSOLIDATING ALL OF THESE PREVIOUSLY ADOPTED AMENDMENTS TO THE ICLL WITH THE 1988 PROTOCOL IS DESIGNED TO EXPEDITE THE ENTRY INTO FORCE OF THESE AMENDMENTS, SINCE THE PROTOCOL HAS LESS STRINGENT ENTRY-INTO-FORCE PROVISIONS.

MOST SIGNIFICANT OF THESE AMENDMENTS ARE THOSE ADOPTED IN 1975 WHICH PROVIDE FOR THE TACIT AMENDMENT PROCEDURE TO EXPEDITE THE ENTRY INTO FORCE OF TECHNICAL AMENDMENTS TO THE REGULATIONS OF THE ICLL. THE TACIT AMENDMENT PROCEDURE WAS DESIGNED TO PREVENT THE LONG DELAY IN BRINGING INTO FORCE IMPORTANT TECHNICAL AMENDMENTS TO TREATIES. THE TACIT AMENDMENT PROCEDURE HAS BEEN USED SUCCESSFULLY TO EXPEDITE AMENDMENT OF REGULATIONS OF SUCH IMO CONVENTIONS AS THE 1972 CONVENTION ON THE INTERNATIONAL REGULATIONS FOR PREVENTING COLLISIONS AT SEA; THE 1973 CONVENTION FOR THE PREVENTION OF POLLUTION BY SHIPS, AS AMENDED AND SUPPLEMENTED BY THE 1978 PROTOCOL; AND THE 1974 SOLAS CONVENTION. THE LACK OF SUCH TACIT AMENDMENT PROCEDURE HAS MADE LOAD LINES A STAGNANT CONVENTION, WHILE SOLAS AND THE OTHER IMO CONVENTIONS HAVING THE TACIT AMENDMENT PROCEDURE HAVE BEEN MODIFIED IN A

TIMELY MANNER, KEEPING ABREAST OF THE RAPID TECHNOLOGICAL DEVELOPMENTS TAKING PLACE IN THE SHIPPING INDUSTRY.

IMPLEMENTATION OF THE 1988 PROTOCOLS TO SOLAS AND ICLL WILL NOT REQUIRE ADDITIONAL LEGISLATION.

THE U.S. COAST GUARD AND THE DEPARTMENT OF STATE RECOMMEND THAT THE SENATE GIVE ADVICE AND CONSENT TO THE PROTOCOLS AT AN EARLY DATE.

IN CLOSING, LET ME AGAIN EMPHASIZE THAT THE RATIFICATION OF THESE TREATIES WILL GREATLY ENHANCE THE COAST GUARD'S ABILITY TO PROMOTE SAFETY OF LIFE AT SEA AND TO PROTECT THE MARINE ENVIRONMENT.

I WANT TO REFUTE ANY ASSERTIONS THAT THESE TREATIES WILL SOMEHOW WEAKEN OUR MARINE SAFETY STANDARDS. THE OPPOSITE IS THE CASE. THESE TREATIES WILL STREAMLINE AND STRENGTHEN INTERNATIONAL SAFETY STANDARDS, WITHOUT IN ANY WAY WEAKENING U.S. SAFETY REGULATIONS OR THEIR ENFORCEMENT.

THIS CONCLUDES MY PREPARED STATEMENT. I WILL BE HAPPY TO ANSWER ANY QUESTIONS YOU MAY HAVE.